



ORIGINAL

Approved: Daniel Nessim
 DANIEL G. NESSIM
 Assistant United States Attorney

Before: THE HONORABLE KEVIN N. FOX
 United States Magistrate Judge
 Southern District of New York

18 MAG 5565
 DOC # _____

----- X	:	SEALED
UNITED STATES OF AMERICA	:	COMPLAINT
	:	
- v. -	:	Violation of 18
	:	U.S.C. § 371
	:	
JEREMY ALLEN,	:	COUNTY OF OFFENSE:
	:	BRONX
Defendant.	:	
	:	
----- X	:	

SOUTHERN DISTRICT OF NEW YORK, ss.:

TYLER MICELI, being duly sworn, deposes and says that he is a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF") and charges as follows:

COUNT ONE
 (Firearms Trafficking Conspiracy)

1. From at least in or about May 2016, up to and including at least on or about June 17, 2016, in the Southern District of New York and elsewhere, JEREMY ALLEN, the defendant, and others known and unknown, willfully and knowingly did combine, conspire, confederate, and agree, together and with each other, to commit an offense against the United States, to wit, trafficking in firearms, in violation of Title 18, United States Code, Section 922(a)(1)(A).

2. It was a part and an object of the conspiracy that JEREMY ALLEN, the defendant, and others known and unknown, not being licensed importers, licensed manufacturers, or licensed dealers of firearms within the meaning of Chapter 44, Title 18, United States Code, would and did willfully and knowingly engage in the business of dealing in firearms, and in the course of such business would and did ship, transport, and receive firearms in

interstate and foreign commerce, in violation of Title 18, United States Code, Section 922(a)(1)(A).

OVERT ACT

3. In furtherance of said conspiracy and to effect the illegal object thereof, the following overt act, among others, was committed in the Southern District of New York and elsewhere:

a. On or about May 1, 2016, JEREMY ALLEN, the defendant, purchased four firearms.

(Title 18, United States Code, Section 371.)

The bases for my knowledge and the foregoing charge are, in part, as follows:

4. I am a Special Agent with the Bureau of Alcohol, Tobacco, Firearms, and Explosives ("ATF"). I have been personally involved in the investigation of this matter. This affidavit is based in part upon my review of databases and documents, and my conversations with other law enforcement agents and lay witnesses with personal knowledge of the facts contained herein. Because this affidavit is being submitted for the limited purpose of establishing probable cause, it does not include all the facts that I have learned during the course of my investigation. Where the contents of documents and the actions, statements, and conversations of others are reported herein, they are reported in substance and in part, except where otherwise indicated.

5. Based on my review of a database maintained by the ATF that tracks incidents where individuals purchase more than one firearm from the same gun dealer, I have learned the following:

a. On or about May 1, 2016, JEREMY ALLEN, the defendant, purchased four firearms at a gun store in the state of Georgia.

b. On or about June 2, 2016, ALLEN purchased five firearms at a store selling firearms and other goods in the state of Georgia.

c. On or about June 17, 2016, ALLEN purchased three firearms at a gun store in the state of Georgia.

6. Based on my personal participation in this investigation, I know that on or about July 19, 2016, I and other

law enforcement officers interviewed JEREMY ALLEN, the defendant, about his multiple-firearm purchases. ALLEN stated, in sum and substance, that he purchased the twelve firearms for a co-conspirator not named as a defendant herein ("CC-1"). CC-1 gave ALLEN the money to buy the firearms and paid ALLEN approximately \$250. CC-1 informed ALLEN that CC-1 would transport the firearms by bus to the Bronx, New York and that CC-1 would sell the firearms there.

7. Based on my conversations with other law enforcement officials and my review of law enforcement databases tracking the use of firearms in criminal activity, I know that several of the firearms purchased by JEREMY ALLEN, the defendant, were in fact used in connection with criminal activity in the New York City area.

WHEREFORE, deponent respectfully requests that a warrant be issued for the arrest of JEREMY ALLEN, the defendant, and that he be arrested, and imprisoned or bailed, as the case may be.



TYLER MICELI
Special Agent
Bureau of Alcohol, Tobacco,
Firearms, and Explosives

Sworn to before me this
27th day of June, 2018



THE HONORABLE KEVIN N. FOX
UNITED STATES MAGISTRATE JUDGE
SOUTHERN DISTRICT OF NEW YORK